PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Ranch Fiberglas, Inc.
28564 Holiday Place
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-10481-00110	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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General Construction Conditions

Effective Date of the Permit

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary fiberglass component manufacturing plant.

Responsible Official:	Walter M. Stankovich
Source Address:	28564 Holiday Place, Elkhart, Indiana 46517
Mailing Address:	28564 Holiday Place, Elkhart, Indiana 46517
SIC Code:	3089
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, PSD Rules Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) gel coat booth with two (2) air-assisted airless gel coat guns, identified as Gel-01 and Gel-02, respectively, each with a maximum capacity to coat 40 units per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as A1 and A2. (Constructed pre-1970)

(2) One (1) chop booth, with one (1) flow coating spray system, with a maximum capacity of 40 units per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as B1 and B2. (Constructed pre-1970)

(3) One (1) paint booth with one (1) HVLP spray gun, with a maximum capacity to paint 100 units per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as C1 and C2. (Constructed in 1991)

(4) One (1) clear coat booth with one (1) HVLP spray gun, with a maximum capacity to paint 100 units per hour, using a waterwash filter to control particulate matter emissions, and exhausting to one (1) stack, identified as C3. (Constructed in 1993)

(5) One (1) rail area, with one (1) HVLP spray gun and one (1) flow coating spray system, with a maximum capacity to paint twelve (12) units per hour, using dry filters for overspray control and exhausting to one stack, identified as D1. (Constructed in 1998)

(6) One (1) mold shop, with four (4) air atomization spray guns, with a maximum capacity to paint four (4) units per month, exhausting to one (1) stack, identified as E1. (Constructed in 1998)

(7) One (1) 110 gallon methylene chloride cleaning tank, to be used on a quarterly basis for approximately 60 hours each quarter.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(2) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(a) Two (2) 200 gallon resin mixing tanks, identified as Mix1 and Mix2.
(b) One (1) 6000 gallon resin holding tank, identified as RT1.

(3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(4) The following equipment related to the manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment:

(a) Three (3) tig welders
(b) Three (3) stick welders
(c) Three (3) mig welders

(5) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(6) Paved and unpaved roads and parking lots with public access.

(7) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C.

(8) Machining where an aqueous cutting coolant continuously floods the machining interface.

(9) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(10) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(11) Any operation using aqueous solutions containing less than 1% by weight of VOC'S excluding HAP's.

(12) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAP's.

(13) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(14) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(15) Blowdown for any of the following: sight glass; compressors; pumps; and cooling tower.

(16) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatice conveying; and woodworking operations.

(a) One (1) fiberglass grinding booth, with a maximum capacity of 150 units per day, with one (1) closed loop baghouse dust collector for particulate matter control, exhausting to one (1) dust collector, identified as DC-1.

(17) Other activities or categories not previously identified:

Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day	Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day	Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day	Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

(a) One (1) paint mixing room, exhausting to one (1) stack, identified as F1.
(b) Fifteen (15) paint pumps.
(c) Miscellaneous hand grinders/buffers/cutter tools that are located outside of the grinding booth and throughout the facility.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(i) A brief description of the change within the source;

(ii) The date on which the change will occur;

(iii) Any change in emissions; and

(iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) One (1) gel coat booth with two (2) air-assisted airless gel coat guns, identified as Gel-01 and Gel-02, respectively, each with a maximum capacity to coat 40 units per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as A1 and A2. (Constructed pre-1970)

(2) One (1) chop booth, with one (1) flow coating spray system, with a maximum capacity of 40 units per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as B1 and B2. (Constructed pre-1970)

(3) One (1) paint booth with one (1) HVLP spray gun, with a maximum capacity to paint 100 units per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as C1 and C2. (Constructed in 1991)

(4) One (1) clear coat booth with one (1) HVLP spray gun, with a maximum capacity to paint 100 units per hour, using a waterwash filter to control particulate matter emissions, and exhausting to one (1) stack, identified as C3. (Constructed in 1993)

(5) One (1) rail area, with one (1) HVLP spray gun and one (1) flow coating spray system, with a maximum capacity to paint twelve (12) units per hour, using dry filters for overspray control and exhausting to one stack, identified as D1. (Constructed in 1998)

(6) One (1) mold shop, with four (4) air atomization spray guns, with a maximum capacity to paint four (4) units per month, exhausting to one (1) stack, identified as E1. (Constructed in 1998)

(7) One (1) insignificant degreasing operation.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

(a) Pursuant to CP No. 039-2711-00110, issued on January 12, 1993, the input volatile organic compound (VOC) content of coating to the paint booth and clear coat booth exhausting to stacks C1, C2 and C3 shall be less than twenty five (25) tons per twelve (12) month consecutive period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOCs to less than twenty five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6, not applicable.

(b) Pursuant to CP No. 039-9503-00110, issued July 10, 1998, the input volatile organic compound (VOC) content of coating to the rail area and mold shop shall be less than twenty five (25) tons per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOCs to less than twenty five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6, not applicable.

D.1.2 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, and CP No. 039-9503-00110, issued on July 10, 1998, operating conditions for the rail area and mold shop shall be the following:

(a) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic hazardous air pollutant (HAP) from use of such resins and gel coats only shall be less than ten (10) tons per twelve (12) consecutive month period of any single HAP or twenty five (25) tons per twelve (12) consecutive month period of any combination of HAPS, Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(2) The emission factors approved for use by IDEM, OAM shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

D.1.3 Cold Cleaner Operation [326 IAC 8-3-2]

The owner or operator of a cold cleaning facility shall:

(a) Equip the cleaner with a cover;
(b) Equip the cleaner with a facility for draining cleaned parts;
(c) Close the degreaser cover whenever parts are not being handled in the cleaner;
(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(e) Provide a permanent, conspicuous label summarizing the operating requirements;
(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) overspray from the gel coat booth, chop booth, paint booth, clear coat booth, rail area, and mold shop shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the gel coat booth, chop booth, paint booth, clear coat booth, rail area, and mold shop and any control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gel coat booth, chop booth, paint booth, clear coat booth, rail area, and mold shop are in operation.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (A1, A2, B1, B2, C1, C2, C3, D1 and E1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

One (1) 110 gallon methylene chloride cleaning tank, to be used on a quarterly basis for approximately 60 hours each quarter.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.3 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

D.2.4 Halogenated Solvent Cleaning NESHAP [326 IAC 20-6-1][40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

(a) The Permittee shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal, and a water layer at a minimum thickness of 2.5 centimeters (1.0 inch) on the surface of the solvent within the cleaning machine.

D.2.5 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

(a) The owner or operator of a cold cleaning degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100 EF);

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38E C) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.'

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38E C) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC)(one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiler or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain the cleaned articles fora t least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in a ny manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.2.7 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit or by 40 CFR 63.465, Test Methods. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

Recordkeeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.2.8 Reporting Requirements

(a) As required under 40 CFR 63.468(b), the Permittee shall submit an initial notification report as soon as practicable before construction or reconstruction of the 110 gallon methylene chloride cleaning tank is planned to commence. The report shall include all of the information required in 40 CFR 63.5(d)(1), with the following revisions and additions:

(1) A brief description of the 110 gallon methylene chloride cleaning tank including machine type (i.e., batch cold), solvent/air interface area, and existing controls.

(2) The anticipated compliance approach for the 110 gallon methylene chloride cleaning tank

(3) In lieu of 40 CFR 63.5(d)(1)(ii)(H), an estimate of annual halogenated HAP solvent consumption for the 110 gallon methylene chloride cleaning tank.

(b) As required under 40 CFR 63.468(c), the Permittee shall submit a compliance report for the 110 gallon methylene chloride cleaning tank no later than 150 days after startup. This report shall include the following requirements:

(1) The name and address of the Permittee;

(2) The address (i.e., physical location) of the 110 gallon methylene chloride cleaning tank;

(3) A statement signed by the Permittee, stating that the 110 gallon methylene chloride cleaning tank is in compliance with the provisions of 40 CFR Part 63, Subpart T.

(4) The compliance approach for the 110 gallon methylene chloride cleaning tank.

(c) The reports required in Condition D.2.8 (a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Ranch Fiberglas, Inc.
Source Address: 28564 Holiday Place, Elkhart, Indiana 46517
Mailing Address: 28564 Holiday Place, Elkhart, Indiana 46517
Part 70 Permit No.: T039-10481-00110

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Ranch Fiberglas, Inc.
Source Address: 28564 Holiday Place, Elkhart, Indiana 46517
Mailing Address: 28564 Holiday Place, Elkhart, Indiana 46517
Part 70 Permit No.: T039-10481-00110

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
- C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ranch Fiberglas, Inc.
Source Address: 28564 Holiday Place, Elkhart, Indiana 46517
Mailing Address: 28564 Holiday Place, Elkhart, Indiana 46517
Part 70 Permit No.: T039-10481-00110
Facility: Paint booth and Clear coat booth exhausting to stacks C1, C2, and C3
Parameter: Input VOC
Limit: Less than twenty five (25) tons per twelve consecutive month period, rolled on a monthly basis

YEAR: _____

Month	VOC Usage/Emissons (tons/month)	VOC Usage/Emissions Previous 11 Months (tons)	VOC Usage/Emissions 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ranch Fiberglas, Inc.
Source Address: 28564 Holiday Place, Elkhart, Indiana 46517
Mailing Address: 28564 Holiday Place, Elkhart, Indiana 46517
Part 70 Permit No.: T039-10481-00110
Facility: Rail area and Mold shop
Parameter: Input VOC, single HAP, and total HAPs
Limit: less than 25, less than 10 and less than 25, per twelve (12) consecutive month period, rolled on a monthly basis

YEAR: _____

Month		VOC Usage/Emissons (tons/month)	Single HAP Usage/Emissions (tons/month)	Total HAPs Usage/Emissions (tons/month)
Month 1	This Month			
	Previous 11 Months			
	12 Month Total			
Month 2	This Month			
	Previous 11 Months			
	12 Month Total			
Month 3	This Month			
	Previous 11 Months			
	12 Month Total			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Ranch Fiberglas, Inc.
Source Address: 28564 Holiday Place, Elkhart, Indiana 46517
Mailing Address: 28564 Holiday Place, Elkhart, Indiana 46517
Part 70 Permit No.: T039-10481-00110

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name: **Ranch Fiberglas, Inc.**
Source Location: **28564 Holiday Place, Elkhart, IN 46517**
County: **Elkhart**
SIC Code: **3089**
Operation Permit No.: **T039-10481-00110**
Permit Reviewer: **Felicity L. Lao**

On November 11, 1999, the Office of Air Management (OAM) had a notice published in the Elkhart Truth newspaper, Elkhart, Indiana, stating that Ranch Fiberglas, Inc. had applied for a Part 70 Operating Permit to operate a fiberglass component manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 22, 1998, Ranch Fiberglass appealed the Part 70 permit issued to them (T039-6172-00110) on September 25, 1998. The Petition for Review alleged that IDEM, OAM failed to include the equipment covered in CP No. 039-9503-00110, issued on July 10, 1998. This Part 70 permit, T039-10481-00110 is to include the equipment covered in CP No. 039-9503-00110. Many of the comments, specifically with respect to the A, B, and C sections of the permit which were made during the public comment period by Ranch Fiberglas, Inc. are outside the scope of the Petition for Review. These comments should have been made during the public comment period for the original Part 70 permit, T039-6172-00110. If Ranch Fiberglas, Inc. would like other provisions of the permit modified with respect to those sections, a request for a permit modification needs to be filed with IDEM, OAM and those provisions will be handled accordingly at that time.

On December 13, 1999, Ranch Fiberglas submitted comments on the proposed Part 70 permit. The summary of the comments, with respect to the D sections of the permit, is as follows:

Comment 1:

Section D.1
The facility description box for Section D.1 purports to identify the maximum capacity of various pieces of equipment. There is no justification for limits on the Permittee's operating capacity. The description box should contain a phrase that clarifies that the information contained in it solely for descriptive purposes and does not constitute enforceable conditions. The information in this box is similar to the information in Section A which is also descriptive information only.

Response to Comment 1:

Included in the facility description box for Section D.1 is "Facility Description [326 IAC 2-7-5(15)] " which is a rule cite that notes the information is descriptive information only. No change has been made to the final permit as a result of this comment.

Comment 2:

Condition D.1.2 should be renumbered as Condition D.1.1.

Response to Comment 2:

The change has been made to correct the typographical error.

Comment 3:

Condition D1.2(a)(1)
The last sentence of Condition D.1.2(a)(1) states that "Emission factors shall be obtained from the reference approved by IDEM, OAM." Condition D.1.2(a)(2) already sets forth a specific, approved reference. IDEM, OAM may not reserve the right to amend this during the term of the permit without observing procedures to amend the permit, including an opportunity for Permittee to comment and object if appropriate. Therefore, the last sentence in Condition D.1.2(a)(1) should be deleted.

Response to Comment 3:

Condition D.1.2 has been updated and changed as follows:

D.1.2 New Source Toxics Control [326 IAC 2-4.1-**1**]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, and CP No. 039-9503-00110, issued on July 10, 1998, operating conditions for the rail area and mold shop shall be the following:

(a) **Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic hazardous air pollutant (HAP) from use of such resins and gel coats only shall be** ~~Pursuant to CP No. 039-9503-00110, issued on July 10, 1998, the rail area and mold shop are limited to~~ less than ten (10) tons per **twelve (12) consecutive month period** ~~year~~ of any single HAP or twenty five (25) tons per **twelve (12) consecutive month period** ~~year~~ of any combination of HAPs, ~~therefore, the source is not subject to the provisions 326 IAC 2-1-3.4 (Maximum Achievable Control Technology)~~ **Compliance with this limit shall be determined based upon the following criteria:**

(1) Monthly usage by weight, ~~monomer~~ content **of monomer that is HAP**, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(2) ~~Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form,~~ **The** emission factors **approved for use by IDEM, OAM** shall be taken from the following reference ~~approved by IDEM, OAM~~: "**Unified Emission Factors for Open Molding of Composites** ~~CFA Emission Models for the Reinforced Plastics Industries~~", Composites Fabricators Association, **April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document.** ~~February 28, 1998, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied.~~ For the purposes of these emission calculations, **HAP** monomer in resins and gel coats that is not styrene or **methyl methacrylate** shall be considered as styrene on an equivalent weight basis.

Comment 4:

Condition D.1.3(f)
Should be revised to delete the phrase "(2%) " located between the phrases "greater than twenty percent" and "of the waste solvent" and replace it with the phrase "(20%)". The revision is necessary to conform to 326 IAC 8-3-2(6) and to be consistent with the words "twenty percent".

Response to Comment 4:

The change has been made to correct the typographical error.

Comment 5:

Condition D.1.5
Should be revised to remove the reference to the gel coat booth, chop booth, paint booth, clear coat booth, rail area and mold shop. Preventive maintenance plans only apply to control equipment, not to facilities unless their malfunction can directly effect emissions which is not the case with these units.

Response to Comment 5:

IDEM, OAM does not agree that preventive maintenance plans (PMPs) only apply to control equipment. PMPs are applicable to emission units and control devices. If lack of proper maintenance could cause or contribute to a violation of any limitation on emissions or potential to emit, then a PMP will be required even if there is no control device. The wording of 326 IAC 1-6-5 clarifies that the PMP includes emission units since the PMP can be changed to reduce excessive malfunctions in combustion and process equipment, as well as control devices. Complying with the requirements of 326 IAC 6-3-2 can be especially variable for spray operations such as the facilities in question. The actual substrate being coated, the solids content of the coating being used, the gallons or pounds of solids used, transfer efficiency, and/or other factors can affect the process weight rate as well as affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these constituents, relying on this information as an ongoing demonstration of compliance is difficult if the constituents are not themselves enforceable. IDEM, OAM does not believe that it would be generally advisable to include these constituents as permit conditions, to make them enforceable or to presume they are so fixed that they define a source's potential emissions because that could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. In this case, IDEM, OAM has determined that the faciliites in question require preventive maintenance plans. No changes have been made to the final permit as a result of this comment.

Comment 6:

Conditions D.1.6 and D.1.7
Should be revised to allow the Permittee to challenge IDEM's decision to require compliance monitoring should IDEM determine that compliance monitoring is necessary. This is necessary to preserve the Permittee's right to challenge the requirement to test.

Response to Comment 6:

Condition D.1.6 (Testing Requirements) and Condition C.9 (Compliance Schedule) have been deleted. The references to Condition C.9 originally under the section entitled Compliance Monitoring Requirements has instead been replaced with a new C.9 condition, (Compliance Requirements) which refers to our general compliance authority in 326 IAC 2-1.1-11 and will be located in a new section titled Compliance Requirements. The remaining conditions have been renumbered accordingly and the table of contents has been updated. The changes mentioned above are outlined below:

Condition D.1.7 points out the acceptable methods for demonstrating compliance with the limits set forth in Conditions D.1.1 and D.1.2, and pursuant to 326 IAC 2-1.1-11, Condition D.1.7 will remain unchanged.

~~D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Compliance Requirements [326 IAC 2-1.1-11]
(to be located between the Testing Requirements section and the Compliance Monitoring Requirements section)

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

~~C.9 Compliance Schedule [326 IAC 2-7-6(3)]~~

~~The Permittee:~~

~~(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and~~

~~(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and~~

~~(c) Will comply with such applicable requirements that become effective during the term of this permit.~~

Comment 7:

Condition D.1.9
Should be revised to require the operation of the dry filters when the booth is operating and when operation of the filters is necessary to comply with applicable emission limitations. If operating the dry filters is not necessary to meet applicable emission limitations, requiring that the dry filters be used is not necessary. The regulations only allow the imposition of monitoring and record keeping that is necessary to ensure compliance and this is well beyond what is necessary.

Response to Comment 7:

Pursuant to the letter received by IDEM, OAM on February 14, 2000, Ranch Fiberglas, Inc. has retracted this comment. No change has been made to the final permit as a result of this comment.

Comment 8:

Condition D.1.10
Conditions D.1.10 (a) and (b) purport to require daily and weekly filter inspections and monthly inspections of rooftops and the ground to determine if overspray is present. Condition D.1.10 (b) also refers to Compliance Response Plans which, as previously stated, IDEM has no authority to require. These requirements are unnecessary, excessive, and can pose a safety hazard to facility personnel. Therefore, Conditions D.1.10 (a) and (b) should be deleted in their entirety and replaced with a requirement to train maintenance personnel and spray operators regarding filter placement.

Response to Comment 8:

Pursuant to the letter received by IDEM, OAM on February 14, 2000, Ranch Fiberglas, Inc. has retracted this comment. No change has been made to the final permit as a result of this comment.

Comment 9:

Condition D.1.11(a)(2)
Condition D.1.11(a)(2) should be deleted in its entirety. The requirement to maintain a log of the dates of VOC use is duplicative and unnecessary in light of the required data regarding monthly recordkeeping for total VOC usage.

Response to Comment 9:

Condition D.1.11 (a)(2) (now renumbered as Condition D.1.10) has been removed from the final permit.

Comment 10:

Condition D.1.11(b)
Should be revised to delete the reference to weekly overspray inspections and daily and monthly inspections. This revision is necessary for this condition to conform to the revised version of condition D.1.10 previously discussed.

Response to Comment 10:

Pursuant to the letter received by IDEM, OAM on February 14, 2000, Ranch Fiberglas, Inc. has retracted this comment. No change has been made to the final permit as a result of this comment.

Comment 11:

Condition D.1.12
Should be revised to delete the references to quarterly summaries and replace them with references to semi-annual summaries. These revisions are necessary to correspond with the semi-annual certification requirement.

Response to Comment 11:

IDEM has established quarterly reporting of VOC usage as standard for sources with material usage or other process limits such as PSD, BACT or MACT limits. Ranch Fiberglas, Inc. has limits to avoid 326 IAC 8-1-6 and 326 IAC 2-4.1-1 which in turn keep them below 326 IAC 2-2 levels. These limits require relatively short term reporting in order to demonstrate compliance and semi-annual reporting is not believed to be sufficient. Pursuant to 326 IAC 2-1-3(i)(8), IDEM may impose permit conditions as necessary to ensure that the source will comply with all applicable rules. No change has been made to the final permit as a result of this comment.

Comment 12:

Section D.2
The facility description box for Section D.2 purports to identify a usage limit for the methylene chloride cleaning tank. There is no justification for limits on the Permittee's operating capacity. The description box should contain a phrase that clarifies that the information contained in it is solely for descriptive purposes and does not constitute enforceable conditions. The information in this box is similar to the information in Section A which is also descriptive information only.

Response to Comment 12:

Included in the facility description box for Section D.1 is "Facility Description [326 IAC 2-7-5(15)] " which is a rule cite that notes the information is descriptive information only. No change has been made to the final permit as a result of this comment.

Comment 13:

Condition D.2.6
Should be revised to delete the reference to "facility". Preventive maintenance plans only apply to control equipment, not to facilities unless their malfunction can directly effect emissions which is not the case with this unit.

Response to Comment 13:

IDEM, OAM does not agree that preventive maintenance plans (PMPs) only apply to control equipment. PMPs are applicable to emission units/facilities and control devices. If lack of proper maintenance could cause or contribute to a violation of any limitation on emissions or potential to emit, then a PMP will be required even if there is no control device. The wording of 326 IAC 1-6-5 clarifies that the PMP includes emission units (facilities) since the PMP can be changed to reduce excessive malfunctions in combustion and process equipment, as well as control devices. IDEM, OAM has determined that the faciliity in question requires a preventive maintenance plan. No changes have been made to the final permit as a result of this comment.

Comment 14:

Part 70 Quarterly Reports
These reports should be renamed as semi-annual reports.

Response to Comment 14:

IDEM has established quarterly reporting of VOC usage as standard for sources with material usage or other process limits such as PSD, BACT or MACT limits. Ranch Fiberglas, Inc. has limits to avoid 326 IAC 8-1-6 and 326 IAC 2-4.1-1 which in turn keep them below 326 IAC 2-2 levels. These limits require relatively short term reporting in order to demonstrate compliance and semi-annual reporting is not believed to be sufficient. Pursuant to 326 IAC 2-1-3(i)(8), IDEM may impose permit conditions as necessary to ensure that the source will comply with all applicable rules. No change has been made to the final permit as a result of this comment.

Comment 15:

Part 70 Operating Permit Quarterly Compliance Monitoring Report
This report should be renamed as a semi-annual report.

Response to Comment 15:

IDEM has established quarterly reporting of VOC usage as standard for sources with material usage or other process limits such as PSD, BACT or MACT limits. Ranch Fiberglas, Inc. has limits to avoid 326 IAC 8-1-6 and 326 IAC 2-4.1-1 which in turn keep them below 326 IAC 2-2 levels. These limits require relatively short term reporting in order to demonstrate compliance and semi-annual reporting is not believed to be sufficient. Pursuant to 326 IAC 2-1-3(i)(8), IDEM may impose permit conditions as necessary to ensure that the source will comply with all applicable rules. No change has been made to the final permit as a result of this comment.

Comment 16:

Technical Support Document
IDEM should revise the Technical Support Document to incorporate the comments described above.

Response to Comment 16:

This addendum serves to note the changes that have been made based on comments received during the Public Notice period. The permit itself is the enforceable document and the changes are made to it not the Technical Support Document (TSD), therefore, the TSD will remain unchanged.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Ranch Fiberglas, Inc.**
Source Location:	**28564 Holiday Place, Elkhart, IN 46517**
County:	**Elkhart**
SIC Code:	**3089**
Operation Permit No.:	**T039-10481-00110**
Permit Reviewer:	**Felicity L. Lao**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Ranch Fiberglas, Inc. relating to the operation of a fiberglass component manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices

(1) One (1) gel coat booth with two (2) air-assisted airless gel coat guns, identified as Gel-01 and Gel-02, respectively, each with a maximum capacity to coat 40 units per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as A1 and A2. (Constructed pre-1970)

(2) One (1) chop booth, with one (1) flow coating spray system, with a maximum capacity of 40 units per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as B1 and B2. (Constructed pre-1970)

(3) One (1) paint booth with one (1) HVLP spray gun, with a maximum capacity to paint 100 units per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as C1 and C2. (Constructed in 1991)

(4) One (1) clear coat booth with one (1) HVLP spray gun, with a maximum capacity to paint 100 units per hour, using a waterwash filter to control particulate matter emissions, and exhausting to one (1) stack, identified as C3. (Constructed in 1993)

(5) One (1) rail area, with one (1) HVLP spray gun and one (1) flow coating spray system, with a maximum capacity to paint twelve (12) units per hour, using dry filters for overspray control and exhausting to one stack, identified as D1. (Constructed in 1998)

(6) One (1) mold shop, with four (4) air atomization spray guns, with a maximum capacity to paint four (4) units per month, exhausting to one (1) stack, identified as E1. (Constructed in 1998)

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

(a) One (1) 110 gallon methylene chloride cleaning tank, to be used on a quarterly basis for approximately 60 hours each quarter.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(2) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(a) Two (2) 200 gallon resin mixing tanks, identified as Mix1 and Mix2.
(b) One (1) 6000 gallon resin holding tank, identified as RT1.

(3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(4) The following equipment related to the manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment:

(a) Three (3) tig welders
(b) Three (3) stick welders
(c) Three (3) mig welders

(5) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(6) Paved and unpaved roads and parking lots with public access.

(7) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C.

(8) Machining where an aqueous cutting coolant continuously floods the machining interface.

(9) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(10) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(11) Any operation using aqueous solutions containing less than 1% by weight of VOC'S excluding HAP's.

(12) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAP's.

(13) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(14) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(15) Blowdown for any of the following: sight glass; compressors; pumps; and cooling tower.

(16) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatice conveying; and woodworking operations.

(a) One (1) fiberglass grinding booth, with a maximum capacity of 150 units per day, with one (1) closed loop baghouse dust collector for particulate matter control, exhausting to one (1) dust collector, identified as DC-1.

(17) Other activities or categories not previously identified:

Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day	Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day	Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day	Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

(a) One (1) paint mixing room, exhausting to one (1) stack, identified as F1.
(b) Fifteen (15) paint pumps.
(c) Miscellaneous hand grinders/buffers/cutter tools that are located outside of the grinding booth and throughout the facility.

Existing Approvals

The source has been operating under the following approvals:

(1) Registration Permit, issued on January 5, 1982.

(2) Transfer of Registration, issued on October 12, 1989.

(3) Registration Permit, issued on May 17, 1991.

(4) CP No. 039-2065-00110, issued on October 21, 1991.

(5) CP No. 039-2711-00110, issued on January 12, 1993.

(6) A039-7895-00110, issued on March 7, 1997 (amendment to CP No. 039-2711-00110).

(7) TV OP No. 039-6172-00110, issued September 25, 1998.

(8) CP No. 039-9503-00110, issued on July 10, 1998.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 31, 1996. Additional information was received on June 20, 1996. Additional information was received on November 20, 1998, February 18, 1999, and July 2, 1999.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential to Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential to Emit (tons/year)
Methyl Ethyl Ketone	0.44
Xylene	4.45
Toluene	2.13
Methyl Methacrylate	0.05
Ethyl Benzene	1.28
Glycol Ether	1.72
Hexamethylene Diisocyanate	0.03
Methyl Isobutyl Ketone	3.61
Styrene	33.38
Formaldehyde	0.0002
Dimethyl Phthalate	3.21
Hydroquinone	0.03
Methanol	0.13
TOTAL	50.49

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs and PM/PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects Ranch Fiberglas' 1995 emission data and does not include emissions data from the equipment permitted in CP No. 039-9503-00110, issued on July 10, 1998.

Pollutant	Actual Emissions (tons/year)
PM	0.932
PM-10	0.932
SO_2	N/A
VOC	53.8196
CO	N/A
NO_x	N/A
Methyl Ethyl Ketone	0.2257
Xylene	2.2617
Toluene	2.1345
Methyl Methacrylate	0.0256
Ethyl Benzene	0.6523
Glycol Ether	0.8744
Hexamethylene Diisocyanate	0.0176
Methyl Isobutyl Ketone	1.8354
Styrene	16.9686
Formaldehyde	0.0001
Dimethyl Phthalate	1.6326
Hydroquinone	0.0173
Methanol	0.0665

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
*gel coat and chop booth							
**paint booth and clear coat booth				less than 25 tons per twelve (12) consecutive month period			
***rail area and mold shop				less than 25 tons per twelve (12) consecutive month period			less than ten (10) tons for a single HAP and less than twenty five (25) tons for a combination of HAPs

*The gel coat and chop booths were both built prior to 1970 and prior to the applicability dates for PSD and BACT. There are no limits placed on their potential to emit or their limited potential to emit.
**Pursuant to CP No. 039-2711-00110, issued on January 12, 1993, the paint booth and clear coat booth exhausting to stacks E1, E2, and E3 (now C1, C2, and C3 pursuant to this permit)
***Pursuant to CP No. 039-9503-00110, issued on July 10, 1998.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12)(40 CFR Part 60) applicable to this source.

(b) The insignificant degreasing operation is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR Part 63), Subpart T because there are no halogenated solvents used in the degreasing process.

(c) The 110 gallon methylene chloride cleaning tank, is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, since the batch cold cleaning machine uses 100% methylene chloride.

(1) The Permittee shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal, and a water layer at a minimum thickness of 2.5 centimeters (1.0 inch) on the surface of the solvent within the cleaning machine.

(2) A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

(3) The Permittee is not required to test this facility by this permit or by 40 CFR 63.465, Test Methods. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

(4) As required under 40 CFR 63.468(b), the Permittee shall submit an initial notification report as soon as practicable before construction or reconstruction of the 110 gallon methylene chloride cleaning tank is planned to commence. The report shall include all of the information required in 40 CFR 63.5(d)(1), with the following revisions and additions:

(A) A brief description of the tank including machine type (i.e., batch cold), solvent/air interface area, and existing controls.

(B) The anticipated compliance approach for the tank.

(C) In lieu of 40 CFR 63.5(d)(1)(ii)(H), an estimate of annual halogenated HAP solvent consumption for the 110 gallon methylene chloride cleaning tank.

(5) As required under 40 CFR 63.468(c), the Permittee shall submit a compliance report for the 110 gallon methylene chloride cleaning tank no later than 150 days after startup. This report shall include the following requirements:

(A) The name and address of the Permittee;

(B) The address (i.e., physical location) of the tank;

(C) A statement signed by the Permittee, stating that the tank is in compliance with the provisions of 40 CFR Part 63, Subpart T.

(D) The compliance approach for the tank.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on June 20, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration)

(a) The source was constructed prior to 1970, which is prior to the applicability date, August 7, 1977, of the rule, therefore, 326 IAC 2-2, does not apply.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC's and PM. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) overspray from the source shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (New Source Toxics Control)

(a) Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) ten (10) tons per year of any single hazardous air pollutant (HAP) or twenty five (25) tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

(b) The gel coat booth, chop booth, paint booth and clear coat booth were constructed pre-1970, pre-1970, in 1991, and in 1993, respectively, which are all prior to the July 27, 1997, applicability date of the rule, therefore, the gel coat booth, chop booth, paint booth and clear coat booth are not subject to the requirements 326 IAC 2-4.1 (New Source Toxics Control).

(c) The rail area and mold shop were both constructed in 1998, which is after the July 27, 1997 applicability date of the rule. Pursuant to CP No. 039-9503-00110, issued on July 10, 1998, the rail area and mold shop are limited to less than ten (10) tons per year of any single hazardous air pollutant (HAP) or twenty five (25) tons per year of any combination of HAPs, therefore, the source is not subject to the provisions 326 IAC 2-1-3.4 (Maximum Achievable Control Technology)

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

326 IAC 8-1-6 (General Reduction Requirements For New Facilities)

(a) Pursuant to CP No. 039-2711-00110, issued on January 12, 1993, the input volatile organic compound (VOC) content of coating to the paint booth and clear coat booth exhausting to stacks C1, C2 and C3 shall be less than twenty five (25) tons per twelve (12) month consecutive period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOCs to less than twenty five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6, not applicable.

(b) Pursuant to CP No. 039-9503-00110, issued July 10, 1998, the input volatile organic compound (VOC) content of coating to the rail area and mold shop shall be less than twenty five (25) tons per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOCs to less than twenty five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6, not applicable.

(b) The gel coat booth and chop booth were constructed prior to 1970 which is before the January 1, 1980 applicability date of the rule, therefore, 326 IAC 8-1-6 is not applicable.

326 IAC 8-3-2 and 326 IAC 8-3-5 (Cold Cleaner Operation)

(a) The insignificant degreasing operation is subject to the requirements of 326 IAC 8-3-2 because it is an existing facility as of January 1, 1980 and is located in Elkhart county at a source with potential VOC emissions greater than one hundred (100) tons per year. The owner or operator of a cold cleaning facility shall:

(1) Equip the cleaner with a cover;
(2) Equip the cleaner with a facility for draining cleaned parts;
(3) Close the degreaser cover whenever parts are not being handled in the cleaner;
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(5) Provide a permanent, conspicuous label summarizing the operating requirements;
(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (2%) of the waste solvent (by weight) can evaporate into the atmosphere.

(b) The 110 gallon methylene chloride degreasing tank is subject to the requirements of 326 IAC 8-3-5, because it is a new facility constructed after the July 1, 1990 applicability date of the rule.

(1) The owner or operator of a cold cleaning degreaser facility shall ensure that the following control equipment requirements are met:

(A) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(i) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100 EF);

(ii) The solvent is agitated; or

(iii) The solvent is heated.

(B) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38E C) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(C) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(D) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.'

(E) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38E C) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC)(one hundred twenty degrees Fahrenheit (120EF)):

(i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(ii) A water cover when solvent used is insoluble in, and heavier than, water.

(iii) Other systems of demonstrated equivalent control such as a refrigerated chiler or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(2) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(A) Close the cover whenever articles are not being handled in the degreaser.

(B) Drain the cleaned articles fora t least fifteen (15) seconds or until dripping ceases.

(C) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in a ny manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The gel coat booth and chop booth were constructed prior to 1970 which is before the October 7, 1974 applicability date of the rule, and the booths are not located in Marion or Lake counties, therefore, 326 IAC 8-6 is not applicable.

There are no other 326 IAC 8 rules that apply.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

(a) The paint booth, gel coat booth, clear coat booth, chop booth, rail area and mold shop and all associated guns have applicable compliance monitoring conditions as specified below:

(1) Dry filters for PM control shall be in operation at all times when the paint booth, gel coat booth, clear coat booth, chop booth, rail area and mold shop are in operation.

(2) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (A1, A2, B1, B2, C1, C2, C3, D1 and E1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(3) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this fiberglass component manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-6172-00110**. This permit supercedes the previously issued Part 70 Permit No. T039-6172-00110, issued September 25, 1998.

POTENTIAL TO EMIT CALCULATIONS
FOR RAIL AREA AND MOLD SHOP

GEL COAT CALCULATIONS

10.50 lb/gal x 39.23% x 1.1 gal/lb x 8.24 lb/hr = 37.34

37.34* $\frac{\text{pounds gel coat}}{\text{hour}}$ x 20.9% emission factor = 7.80 pounds of gel coat per hour (emissions)

7.80 $\frac{\text{pounds emissions}}{\text{per hour}}$ x 4.38 = **34.18 tons of gel coat per year**

RESIN CALCULATIONS

8.24 lbs/hr x 9.00 lbs/gal x 43.00% x 9.0 gal/lb = 287 lbs/hr of resin

287* $\frac{\text{pounds resin}}{\text{hour}}$ x .12.70% emission factor = 36.45 pounds of resin per hour (emissions)

36.45 $\frac{\text{pounds emissions}}{\text{per hour}}$ x 4.38 x = **159.65 tons of resin per year**

EXISTING SOURCE = 228.00 tons per year
TOTAL POTENTIAL TO EMIT FROM FIBERGLASS OPERATIONS = <u>193.83 tons per year</u>

TOTAL SOURCE PTE *421.83 tons per year*

CFA emission factors for open molding, Revision 3.0 July 1998.

Actual emissions from 1998 Quarterly Reports are shown to be well below the limits set forth in CP No. 039-9503-00110, issued July 10, 1998.